

**Exhibit A**

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-11069 (CTG)

(Jointly Administered)

**Re: Docket No. \_\_\_\_**

**ORDER GRANTING MOTION OF EDGAR CANCINO FOR  
RELIEF FROM THE AUTOMATIC STAY**

Upon consideration of the *Motion of Edgar Cancino for Relief from the Automatic Stay* (the “**Motion**”)<sup>2</sup>, and the Court having reviewed the Motion, and this Court possessing jurisdiction to consider the Motion, and venue being proper, and notice of the Motion having been sufficient under the circumstances, and the Court having considered the Motion and all papers related thereto, and the relief requested in the Motion being warranted,

**IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED, as set forth herein.
2. Movant is granted relief from the automatic stay for cause shown and is permitted to proceed with and prosecute the State Court Action against the Debtors and any other individuals or entities, including any subsequent appeals, provided that Movant shall enforce such claims only against third-party non-debtors, including but not limited to the Debtors’ applicable insurance carriers.

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<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of the Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

<sup>2</sup> Capitalized terms not defined herein shall have the meanings ascribed to them in the Motion.

3. Nothing in this order shall limit or affect Movant's right to file one or more proofs of claim evidencing the claims set forth in the Complaint and to receive any distribution available to similarly situated creditors in these Chapter 11 cases.

4. This Order shall become effective immediately upon entry by the Court and is not subject to the fourteen-day stay provided in Rule 4001(a)(3) of the Federal Rules of Bankruptcy Procedure.

5. This Court shall retain jurisdiction over any and all issues arising from or related to the implementation and interpretation of this Order.